



"Miller, Robert"
<RoMiller@asarco.com>
10/17/2007 03:39 PM

To Linda Jacobson/ENF/R8/USEPA/US@EPA
cc "Nickel, Jon" <JNickel@asarco.com>
bcc

Subject RE: Responses to EPA comments on Demolition Cleaning
and Sampling Plan

Linda, attached are two figures that show the locations of where samples have been collected, and soils have been excavated to accommodate necessary drainage controls and capping actions in unpaved areas in demolition foot print area. Although I was not on-site when sampling and soil excavation was implemented, the following is my understanding of the situation. When Jon returns next week, this information may need to be adjusted.

Figure 1 shows speiss/dross area sampling locations as presented in the work plan (red sites), the one location at the office building foot print that was excavated and sampled as described in Jon's September 26 e-mail to you (green site), and new unpaved areas discovered after demolition and associated proposed additional sample locations (blue sites). As we discussed soils in the office building were excavated to 8 feet, where it was apparent that native alluvial sand and gravel was encountered. I believe this action was conducted September 27, but I will need to confirm the date next week. The soils were sampled at the intervals described in the Sampling Work Plan and have been archived for future analysis. The building foot print area was then backfilled to the designed grade in preparation for the temporary cap. I anticipate soil sample analysis will be conducted next week, pending your review of our comment responses sent to you yesterday. If the analysis shows the proposed soil criteria for excavation depth were exceeded, we are prepared to return to the site and advance the excavation, if necessary.

Figure 2 shows the locations sampled at the Thaw House. As we were discussing last week, my understanding that soils were removed to a depth of 15 feet. Samples were collected in the depth intervals presented in the work plan and have been archived for analysis. The building foot print area was then backfilled to the designed grade in preparation for the temporary cap. I believe this action took place the week of October 1, but will need to confirm the actual date next week. Again, I anticipate analysis will be conducted next week pending your review of comment responses. As described in the responses, the initial sample interval and the final sample interval would be analyzed for the expanded parameter list described in the EPA comments.

As figure 1 shows, most of the sample and excavation work remains to be done in the Speiss-Dross area. This work will have to be implemented after the slurry wall construction project is completed. Access conflicts with the on-going speiss-dross area slurry wall project prohibits conducting the sample and excavation work for these areas at this time.

I hope this addresses your questions and information requests. Call to discuss further.

Bob

-----Original Message-----

From: Jacobson.Linda@epamail.epa.gov
[mailto:Jacobson.Linda@epamail.epa.gov]
Sent: Wednesday, October 17, 2007 11:38 AM

To: Miller, Robert
Cc: Cox, Blaine; Nickel, Jon
Subject: Re: Responses to EPA comments on Demolition Cleaning and Sampling Plan

Mr. Miller,

Thank you for assembling the attached responses. I have not had an opportunity to review these in detail, but upon first glance it appears that several misunderstandings are reflected in these responses.

To better understand the necessity and utility of further comment on and revision of the submitted work plan, I had also requested in my October 10, 2007, email that you please update me on the sampling, removal, and capping activities which you have already performed in the areas covered by this work plan. Please include the dates on which samples were collected, the type of sample collected, and the parameters for which it was or will be analyzed. If my understanding is correct from our telephone conversation last week, the company may have already completed 75 to 85% of the work covered by this work plan prior to EPA comment or approval.

Linda Jacobson
RCRA Enforcement

"Miller, Robert"
<RoMiller@asarco.com>

10/16/2007 03:43 PM

Linda Jacobson/ENF/R8/USEPA/US@EPA

"Nickel, Jon"
<JNickel@asarco.com>, "Cox, Blaine" <BCox@asarco.com>

Subject
Responses to EPA comments on
Demolition Cleaning and Sampling
Plan

To

cc

Linda, attached are our responses to the draft comments we discussed last week.

<<ComResp101607.doc>>

*

This e-mail and any files transmitted with it are the property of ASARCO LLC and/or its affiliates, are confidential, and are intended solely for the use of

the individual or entity to whom this e-mail is addressed. If you are not a named recipient or otherwise have reason to believe that you have received this message in error,

please notify the sender and delete this message immediately from your computer. Any other use, retention, dissemination forwarding, printing or copying of this e-mail is

strictly prohibited. Although this email and any attachments are believed to be free of any virus or other defect that might affect any computer system into which it is

received, and opened, it is the responsibility of the recipient to ensure that it is virus free and no responsibility is accepted by ASARCO LLC and/or its

affiliates for any loss or damage arising in any way from its use

This e-mail has been scanned and cleared by MailMarshal

www.marshalsoftware.com

*(See attached file: ComResp101607.doc)

--
This e-mail message has been scanned for Viruses and Content and cleared by MailMarshal. If this is spam please forward this message to spam@asarco.com so that we may evaluate it and block future messages.

--

*

This e-mail and any files transmitted with it are the property of ASARCO LLC and/or its affiliates, are confidential, and are intended solely for the use of

the individual or entity to whom this e-mail is addressed. If you are not a named recipient or otherwise have reason to believe that you have received this message in error,

please notify the sender and delete this message immediately from your computer. Any other use, retention, dissemination forwarding, printing or copying of this e-mail is

strictly prohibited. Although this email and any attachments are believed to be free of any virus or other defect that might affect any computer system into which it is

received, and opened, it is the responsibility of the recipient to ensure that it is virus free and no responsibility is accepted by ASARCO LLC and/or its affiliates for any loss or damage arising in any way from its use

This e-mail has been scanned and cleared by MailMarshal

www.marshal.com

*



ComRespFigures101707.pdf